

AUG 28 2019

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIACLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

Criminal No. 19-269

v. CHERON TUCKER

) (18 U.S.C. §§ 371, 1028(a)(7), 1029(a)(1)  
) and 1028A(a)(1))INDICTMENTCOUNT ONE

The grand jury charges:

THE CONSPIRACY AND ITS OBJECTS

From on or about December 3, 2018, and continuing to on or about March 28, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, CHERON TUCKER, and other individuals known and unknown to the grand jury, including an individual known to the grand jury as RF, knowingly and willfully did conspire, combine, confederate and agree together and with each other, to commit offenses against the United States, that is:

- (a) Identity Theft, in violation of 18 U.S.C. § 1028(a)(7);
- (b) Use of Counterfeit Access Devices, in violation of 18 U.S.C. § 1029(a)(1);

and

- (c) Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A.

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that TUCKER, and individuals unknown to the grand jury, did unlawfully obtain the means of identification of real persons without their knowledge or consent.

It was further part of the conspiracy that TUCKER sent means of identification of other individuals to RF, and paid RF to manufacture counterfeit driver's licenses using those means

of identification.

It was further a part of the conspiracy that TUCKER used counterfeit driver's licenses (obtained from RF or from other individuals unknown to the grand jury) to make purchases and to rent vehicles in the Western District of Pennsylvania.

It was further a part of the conspiracy that TUCKER used counterfeit credit and/or debit cards—obtained from individuals unknown to the grand jury or manufactured by TUCKER—to make purchases and rent vehicles in the Western District of Pennsylvania.

#### OVERT ACTS

In furtherance of the conspiracy, and to effect the objects of the conspiracy, TUCKER, and individuals known and unknown to the grand jury, including RF, did commit and cause to be committed, the following overt acts, among others, in the Western District of Pennsylvania and elsewhere:

- (a) From on or about December 3, 2018 through March 17, 2019, TUCKER and RF exchanged messages regarding the manufacture and purchase of counterfeit driver's licenses using the means of identification of other individuals;
- (b) On or about December, 31, 2018, TUCKER used a driver's license with the means of identification of real person, WC, and an access device in the name of WC to rent six rooms at the Hilton Garden Inn at 250 Forbes Avenue, Pittsburgh, PA 15222; and
- (c) On or about March 17, 2019, TUCKER used a driver's license with the means of identification of WC and an access device in the name of WC to rent a car from Alamo Rent a Car located at the Pittsburgh International Airport.

In violation of Title 18, United States Code, Section 371.

**COUNT TWO**

The grand jury further charges:

On or about December 31, 2018, in the Western District of Pennsylvania, the defendant, CHERON TUCKER, did knowingly possess and use, in and affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, the name and date of birth of WC, in connection with unlawful activity that constitutes a violation of federal law, to wit, use of counterfeit access devices in violation of 18 U.S.C. § 1029(a)(1), and by such conduct the defendant obtained items of value aggregating \$1,000 or more during a one year period.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 1028(b)(1)(D).

**COUNT THREE**

The grand jury further charges:

On or about March 17, 2019, in the Western District of Pennsylvania, the defendant, CHERON TUCKER, did knowingly possess and use, in and affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and driver's license number of WC, in connection with unlawful activity that constitutes a violation of federal law, to wit, use of counterfeit access devices in violation of 18 U.S.C. § 1029(a)(1).

In violation of Title 18, United States Code, Sections 1028(a)(7) and 1028(b)(2)(A).

**COUNT FOUR**

The grand jury further charges:

On or about December 31, 2018, in the Western District of Pennsylvania, the defendant, CHERON TUCKER, knowingly and with intent to defraud, used a counterfeit credit/debit card, said use affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1) and 1029(c)(1)(A)(i).

**COUNT FIVE**

The grand jury further charges:

On or about March 17, 2019, in the Western District of Pennsylvania, the defendant, CHERON TUCKER, knowingly and with intent to defraud, used a counterfeit credit/debit card, said use affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1) and 1029

(c)(1)(A)(i).

**COUNT SIX**

The grand jury further charges:

On or about December 31, 2018, in the Western District of Pennsylvania, the defendant, CHERON TUCKER, during and in relation to the felony violation of 18 U.S.C. § 1029(a)(1) as set forth in Count Four, did knowingly use, without lawful authority, a means of identification of another person, to wit, the name and date of birth of WC.

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT SEVEN**

The grand jury further charges:

On or about March 17, 2019, in the Western District of Pennsylvania, the defendant, CHERON TUCKER, during and in relation to the felony violation of 18 U.S.C. § 1029(a)(1) as set forth in Count Five, did knowingly use, without lawful authority, a means of identification of another person, to wit, the name, date of birth, and driver's license number of WC.

In violation of Title 18, United States Code, Section 1028A(a)(1).

A True Bill,

  
\_\_\_\_\_  
Foreperson

  
\_\_\_\_\_  
SCOTT W. BRADY  
United States Attorney  
PA ID No. 88352